

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

MATTHEW MCDONALD, et al.,

Plaintiffs,

v.

EDWARD G. ROBINSON III, et al.,

Defendants.

Case No.: 1:18-cv-00697-LMB/TCB

**DEFENDANTS' EDWARD G. ROBINSON AND EDWARD G. ROBINSON III
CONSULTING, LLC MOTION TO DISMISS BASED UPON LACK OF IN PERSONAM
JURISDICTION (FED. R. CIV. PRO. 12(b)(2)); AND, ALTERNATIVELY FOR
IMPROPER VENUE (FED. R. CIV. PRO. 12(b)(3))**

COMES now Defendants Edward G. Robinson III (hereinafter referred to as “Defendant Robinson” or “Defendant”) and Edward G. Robinson III Consulting, LLC (hereinafter referred to as “EGIII”) (“Robinson” and “EGIII” are referred to herein as the “Robinson Defendants”) by counsel, and pursuant to Federal Rule of Civil Procedure (“Fed. R. Civ. Pro.”) 12 (b)(2) and alternatively Fed. R. Civ. Pro. 12 (b)(3), move this Court dismiss with prejudice the styled matter filed herein by Plaintiffs Matthew McDonald (“McDonald”) and MCD Holdings, LLC (“MCDH”) on the grounds that Plaintiffs’ have failed to plead any facts warranting this Court’s exercise of **in personam** jurisdiction over the Robinson Defendants. Alternatively, said Defendants’ move for dismissal because venue is improper in this Court.

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CERTIFICATE OF SERVICE

I hereby certify that on this **23RD DAY OF JULY, 2018**, a copy of the foregoing pleading was served upon Plaintiff's counsel VIA EMAIL as follows: Cathy A. Hinger (cathy.hinger@wbd-us.com) and Lela M. Ames, Womble Bond Dickson (US), LLP, 1200 19th Street, NW, Suite 500, Washington, DC 20036, and Defense Counsel for the McPhun Defendants: Laura Liff, Esq., 1751 Pinnacle Drive, Suite 1500, McLean, VA 22102

/s/ Richard Carnell Baker